

# BakerHostetler

February 20, 2025


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VIA ECF

The Hon. Renée Marie Bumb  
Chief Judge, U.S.D.C. for the District of New Jersey  
4th & Cooper Streets, Room 1050,  
Camden NJ 08101

SO ORDERED this 20th day  
of February 2025  
  
United States District Judge

Re: *Paucek et al. v. Shaulis*, No. 1:24-cv-09807

Dear Chief Judge Bumb:

Plaintiffs Christopher “Chip” Paucek and Pro Athlete Community, Inc. (“PAC”) request permission to file a sur-reply. Defendant Dahn Shaulis has consented to this request.

Shaulis’s Reply Memorandum (Dkt. Nos. 35, 36) introduces evidence on reply concerning PAC’s principal place of business, suggesting that the Court consider that evidence rather than Plaintiffs’ Complaint (Dkt. No. 1). For example, Shaulis relies on PAC’s 2025 SEC filing that erroneously listed PAC’s principal place of business as Miami Beach, Florida. *See* Dkt. No. 36-2. Part of Plaintiffs’ submission will be a declaration from counsel (not our firm) that this was a clerical error made by a paralegal and it should not have been altered from the 2024 SEC filing, attached hereto as **Exhibit A**. Plaintiffs will address this issue and Shaulis’s further evidence in their sur-reply.

Plaintiffs respectfully request a deadline of February 26, 2025 to file their sur-reply, which would be limited five pages, exclusive of exhibits.

Respectfully submitted,

/s/ Chad A. Rutkowski

Chad A. Rutkowski